

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE COMPANY,  
JOHN HANCOCK VARIABLE LIFE INSURANCE  
COMPANY, and INVESTORS PARTNER LIFE  
INSURANCE COMPANY,

Plaintiffs/Counter-Defendants,

V.

ABBOTT LABORATORIES,

Defendant/Counter-Plaintiff.

CIVIL ACTION NO.  
03-12501-DPW

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c)(7) of the Federal Rules of Civil Procedure, the parties respectfully move for the entry of the Stipulated Protective Order filed herewith and attached hereto as Exhibit 1. In support thereof, the parties state that confidential, trade secret or other proprietary commercial information is likely to be produced in connection with this action, and that the parties wish to protect such information against disclosure as set forth in the Stipulated Protective Order.


WHEREFORE, the parties respectfully request that the Court endorse the Stipulated Protective Order as a protective order that will govern in this action. A proposed order endorsing the Stipulated Protective Order is attached hereto as Exhibit 2.

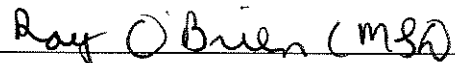
ABBOTT LABORATORIES:

By its attorneys

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COMPANY; and INVESTORS PARTNER  
LIFE INSURANCE COMPANY:

By their attorneys

  
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Date: May 12, 2004